

35340002

ALMA MINOR
2314 Winchester Street, Apt. J
Baltimore, Maryland 21216

Plaintiff

v.

FAMILY DOLLAR STORES OF
MARYLAND, LLC
aka FAMILY DOLLAR STORES OF
MARYLAND, INC
500 Volvo Parkway
Chesapeake, Virginia 23320
Serve On:
CSC-LAWYERS INCORPORATING
SERVICE COMPANY
7 St. Paul Street, Suite 820
Baltimore, Maryland 21202

Defendant

* IN THE CIRCUIT COURT
* OF MARYLAND FOR
* BALTIMORE CITY
* Case No.:

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COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, Alma Minor, by and through her attorneys John R. Roche, Aaron N. Johnson and Ballenger & Roche, LLC, brings this action for damages against Defendant, Family Dollar Stores of Maryland, LLC aka Family Dollar Stores of Maryland, Inc., and in support thereof respectfully represents unto this Honorable Court as follows:

I. PARTIES, JURISDICTION AND VENUE

1. Plaintiff, Alma Minor ("Plaintiff"), is an adult individual and legal resident of the State of Maryland residing at 2314 Winchester Street, Apt. J, Baltimore, Maryland 21216.
2. Defendant, Family Dollar Stores of Maryland, LLC aka Family Dollar Stores of Maryland, Inc. ("Family Dollar" or "Defendant"), is a company doing business in Maryland. Upon information and belief, Family Dollar Stores of Maryland, Inc. was converted and/or merged into Family Dollar Stores of Maryland, LLC.

3. At all times relevant hereto Family Dollar has owned, operated, and managed the business premises known as Family Dollar at 5100 Liberty Heights Avenue, Baltimore City, Maryland 21207 (“the Property”), along with other Family Dollar store locations in Baltimore City, Maryland.

4. Both jurisdiction and venue requirements are satisfied in Baltimore City, Maryland pursuant to § 6-201 of the Maryland Code. Venue is proper because Defendant carries on a regular business in Baltimore City and the underlying events giving rise to the claims herein occurred in Baltimore City. *See Maryland Code, Cts. and Jud. Proc. § 6-201 and §6-202.* This Court has jurisdiction over the controversy because the damages are within the jurisdictional limits and there exists personal jurisdiction because Defendant regularly transacts business in Maryland, supplies goods, foods, and services in Maryland, has an interest in, uses, and possesses real property in the State, caused tortious injury in Maryland, and is served with process in the State. *See Maryland Code, Cts. and Jud. Proc. § 6-101 et seq.*

II. STATEMENT OF APPLICABLE FACTS

5. That on or about October 1, 2017, Plaintiff was shopping at Family Dollar located at 5100 Liberty Heights Avenue, Baltimore City, Maryland 21207 (“the Property”) as an invitee.

6. At the time of the complained of occurrence, Plaintiff had an implied invitation to shop at Defendant’s Property for purposes related to the Defendant’s business interests and financial gain.

7. While Plaintiff was shopping in Defendants’ store, she slipped on detergent that had been spilled upon the floor. Plaintiff fell to the ground and sustained serious bodily injuries.

8. Defendant knew or should have known that a hazardous detergent spill had occurred at the Property, but Defendant failed to timely remedy the dangerous condition and also failed warn its invitees of the dangerous condition until after the complained of incident involving Plaintiff.

9. Defendant had a non-delegable duty to properly maintain the Property in a condition that is safe for the general public, but failed to do so, and was in other ways negligent in causing Plaintiff to sustain serious, painful and permanent injuries to her body along with and great mental suffering; whereby she was and will be obligated to receive hospital and medical care and treatment for such injuries, was and will be required to incur bills for such care and treatment; was and will be prevented from engaging in gainful employment, duties, daily life activities and other pursuits; and was and will be otherwise injured and damaged in the past, present and future.

NEGLIGENCE OF DEFENDANT

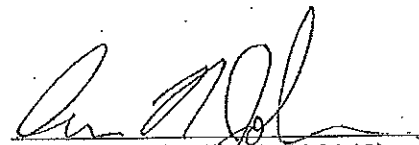
10. As a direct and proximate result of the aforesaid conduct and breach of care of Defendant, and/or Defendant's employees, agents, servants, heirs or assignees, Plaintiff sustained the injuries, losses, and damages which were more fully described above, without any negligence of Plaintiff contributing thereto.

11. WHEREFORE, Plaintiff demands judgment against Defendant, Family Dollar, in an amount in excess of SEVENTY-FIVE THOUSAND DOLLARS (\$75,000.00), together with interests, costs of the suit, and any further relief as determined by the Court.

DEMAND FOR JURY TRIAL

Plaintiff, by and through her attorneys, hereby requests a jury trial on all issues in this case.

Respectfully Submitted,



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Aaron N. Johnson (#1606210128)
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